

Comments on RM-10740

Laurence M. Szendrei, Amateur Radio Station NE1S

I want to register my OPPOSITION to RM-10740, which seeks to limit bandwidth to 2.8KHz for J3E and 5.6KHz for A3E emissions, respectively. I am opposed because:

- (1) An inflexible limit on bandwidth discourages technical experimentation, which is contrary to key elements of the “Basis and Purpose of Amateur Radio” stated in Section 97.1 of the Commission’s rules, namely “continuation and extension of the amateur’s proven ability to contribute to the advancement of the radio art,” “encouragement and improvement of the amateur service through rules which provide for advancing skills in both communications AND TECHNICAL phases of the art”(emphasis added), and “expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronic experts.” A stringent bandwidth requirement discourages equipment construction or modification by raising the concern that the resulting equipment may not be compliant with the bandwidth specification. Indeed, the simple act of changing to a different microphone (with a different frequency response characteristic) could conceivably result in non-compliance.
- (2) A limit on bandwidth might be defensible if band congestion is such that it occurs on all HF amateur bands at all times. But, this is simply not the case. Variables such as propagation conditions, time of day or day of week, location, and many other factors leave portions of the HF amateur frequencies sparsely populated much of the time. On an un-crowded band it does no harm to use a bandwidth far greater than the limits supported by RM-10740. Most fidelity-conscious amateurs employ an “equalizer” in their audio chain which can be used to enhance OR RESTRICT bandwidth appropriate to the degree of congestion.
- (3) This petition appears to be the result of a confrontation between two small groups of amateurs. If so, it is inappropriate for the petitioners to attempt resolution in their favor through legislation that affects the entire American amateur community. The amateur service has been self-policing without such legislation for nearly a century. This type of disagreement could and should be resolved with a bit of compromise, consideration, and courtesy from each of the parties involved.

In conclusion, I believe a hard-fast limit on bandwidth in the amateur service is unnecessary, inappropriate, and would diminish the service, therefore I am opposed to RM-10740.

Laurence M. Szendrei, NE1S  
67 Center Rd.  
Gray ME 04039